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## **Introduction**

Welcome to York Racecourse's privacy notice.

York Racecourse respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please refer to the Glossary to understand the meaning of some of the terms used in this privacy notice.

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how York Racecourse Knavesmire LLP (address: The Racecourse, York, YO23 1EX; company number: OC332112) collects and processes your personal data through your use of this website, your telephone orders, in-person ticket purchases or any enquiry you make with us.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

The term 'Controller' is the technical name for the legal entity responsible for processing your personal data. York Racecourse Knavesmire LLP is the controller for your personal data. Below we may refer to ourselves as "York Racecourse", "we", "us" or "our".

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (see section 9), please contact the data privacy manager using the details set out below.

#### **Contact details**

Full name of legal entity: York Racecourse Knavesmire LLP

Title of data privacy manager: Head of Finance

Email address: [chris.ward@yorkracecourse.co.uk](mailto:chris.ward@yorkracecourse.co.uk)

Postal address: The Racecourse, York YO23 1EX

Phone number: 01904 620911

## Your duty to inform us of changes

To ensure that your information remains accurate and up-to-date, for example, so that we can contact you with an event update, please keep us advised of any changes in your personal details.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers and social media handles.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We will monitor the usage of our website and join or merge personal, transactional and demographic records together to create anonymised information to help us provide a better service. You will be able to be identified from these aggregated datasets.

We do not collect any **Special Categories of Personal Data** about you for example details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data via our website. Nor do we collect any information about criminal convictions and offences. We do collect disability information about you when you join our Carer Goes Free scheme, which we use solely for

the purposes of that scheme including future transactions with you. We will obtain your explicit consent to our holding that data for these purposes when we collect that data from you. Likewise, if you inform us of a dietary requirement, such as a nut allergy, we would also make a note of this on your booking.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we will not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - order products or services;
  - make an enquiry with us;
  - create an account on our website;
  - subscribe to our publications;
  - request marketing to be sent to you;
  - log on to our free wifi system;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns – this is to ensure that our website works and displays correctly for you. We collect this information by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) on our website for further details.
- **Third parties or publicly available sources.** We do receive personal data from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google and Facebook who may be based outside the UK and EEA;
    - (b) advertising networks based both inside or outside the UK and EEA; and
    - (c) search information providers based both inside or outside the UK and EEA.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Opayo based both inside or outside the UK and EEA.

- Identity and Contact Data from data brokers or aggregators such as Halfspace based both inside or outside the UK and EEA.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

to our terms or privacy notice (b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in the Rewards4Racing loyalty programme	(a) Identity (b) Contact (c) Transaction	Consent
To enable you to partake in a competition, promotion or survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We use the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the York Racecourse Knavesmire LLP group of companies for marketing purposes.

### **Racing UK**

We may also ask if you would like to receive marketing from Racing TV. If you give us your consent, we will share your information so that Racing TV can contact you directly. For more details, please click here - <https://www.racingtv.com/>

### **Rewards4Racing**

Rewards4Racing is our fantastic rewards and loyalty programme which is free for all our customers to join and use. As a Rewards4Racing member, you will be entitled to earn Rewards4Racing points when you purchase tickets, raceday packages and hospitality packages at York Racecourse. For more details, please click here - <https://www.rewards4racing.com/>.

**New Members** – when you purchase an advanced ticket (online or by phone) with us, you will earn Rewards4Racing points and we will instruct Rewards4Racing (acting as our data processor) to create you an account with the programme for free using the details (including name, address and email address) that you use on your account with us. Please note that, in order to claim these points, you will need to activate your Rewards4Racing account. Once you activate your Rewards4Racing account, you will become a member of the Rewards4Racing programme and the information relating to your transaction (including the number of tickets or packages purchased and the total price paid) will be processed by Rewards4Racing for the purposes of applying points to your account. Please look out for our email with a link to activate your Rewards4Racing account and start saving towards your next purchase with us.

**Existing Members** – as an existing Rewards4Racing member, following an advanced ticket purchase (online or by phone) with us, the information relating to your transaction (including the number of tickets or packages purchased, the total price paid and any Rewards4Racing points redeemed as part of your transaction) will be processed by Rewards4Racing for the purposes of applying points to, or removing points from, your Rewards4Racing account.

*How Rewards4Racing will use your information:*

To provide member benefits - if you are a customer who is a member of the Rewards4Racing programme, we will share with Rewards4Racing information concerning your transactions with us. The information we share will be used by Rewards4Racing to provide you with member benefits and to operate the Rewards4Racing programme. For more information on how Rewards4Racing will use your information please see its privacy notice, which can be viewed at <https://www.rewards4racing.com/privacy>. Where we share your information in this way, we are not responsible for Rewards4Racing or how it uses your information as a member of the Rewards4Racing programme.

For further details about the Rewards4Racing programme and/or to view Rewards4Racing's full terms and conditions, please click here - <https://www.rewards4racing.com/terms>.

Should you wish to opt-out of the Rewards4Racing programme, you may do so at any time by contacting Rewards4Racing by email at [hello@rewards4racing.com](mailto:hello@rewards4racing.com).

As a service provider to us - from time to time, we ask Rewards4Racing to help us look at improvements to the way in which we engage with our customers. This includes making recommendations to help customers save money on their ticket purchases, providing the tools to help us incentivise customers to come to one of our racedays or improving their experience at one of our racecourses. In providing these services, we may disclose transactional information to Rewards4Racing about our customers (who may not be Rewards4Racing members) so that Rewards4Racing may analyse transactional information, customer purchases and behaviours (and trends) as well as segmenting our customer database. For the purposes of performing these tasks, we continue to control any information shared - Rewards4Racing acts under our instruction and as a data processor only and will not use your personal information for its own purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please visit our website.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.



Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as Halfspace (for market analytics based on aggregated data), 7 League, SHA and Carat (advertising agencies) and Propack (our mailing partner).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Many of our external third parties are based outside the UK and European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside these jurisdictions.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government. For further details, see ICO website on adequacy decisions. Hyperlink <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide/>
- Where we use certain service providers, we use specific contracts approved by the UK Government called IDTAs, which give personal data the same protection it has in the UK and Europe. For further details, see ICO website on international data transfer agreements Link <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-data-transfer-agreement-and-guidance/>
- Where we use providers based in the US, we may transfer data to them if they are part of the Data Privacy Framework which requires them to provide similar protection to personal data shared between the UK and the US. For further details, see ICO website <https://ico.org.uk/about-the-ico/what-we-do/information-commissioners-opinions-on-adequacy/the-uk-government-s-assessment-of-adequacy-for-the-uk-extension-to-the-eu-us-data-privacy-framework/>

Please **contact us** if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for (refer to Section 4), including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the Glossary to find out more about these rights.

If you wish to exercise any of your legal rights, please [contact us](#).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests as soon as possible and in any event within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means you have given us your permission to use your information for a clearly defined purpose and that it was given freely without coercion. It can be withdrawn at any time.

## **THIRD PARTIES**

### **Internal Third Parties**

Other companies in the York Racecourse Group acting as joint controllers or processors and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services, or who help us to look at improvements to the way in which we engage with our customers.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to a copy of your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) or your consent, and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate or legal grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, a copy of any personal data which you have generated and that we hold in an electronic format, and export in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance – details included in Section 1.